



**County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

PHILIP L. BROWNING
Director

Board of Supervisors

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March 29, 2012

To: Supervisor Zev Yaroslavsky, Chairman
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Don Knabe
Supervisor Michael D. Antonovich

From: Philip L. Browning
Director

A handwritten signature in dark ink, appearing to be "P. Browning", is written over the printed name and title of Philip L. Browning.

**INNER CIRCLE FOSTER FAMILY AGENCY CONTRACT COMPLIANCE MONITORING
REVIEW**

In accordance with your Board's March 2, 2011 motion, we are informing your Board of the results of a Foster Family Agency (FFA) compliance review.

The Inner Circle FFA's main office is located in the 3rd Supervisorial District and the Palmdale satellite office is located in the 5th Supervisorial District. Both offices provide services to the Los Angeles County Department of Children and Family Services' (DCFS) foster youth. According to the Agency's program statement, its mission is "to promote the growth of children and youth while strengthening the family unit." The Agency's goal is to "provide a well-rounded experience that will meet each child's individual needs." The Inner Circle FFA is licensed to serve children age birth through 18.

The Out-of-Home Care Management Division (OHCMD), conducted a review of the Inner Circle FFA in April 2011, at which time the Agency had two licensed offices supervising a total of 75 placed DCFS children. The placed children's overall average length of placement was nine months, and the average age was seven. For the purposes of this review, 12 placed children were interviewed in six certified foster homes. Twelve children's case files, along with six certified foster home files and five discharge files were reviewed. Five staff files were reviewed for compliance with the Title 22 Regulations and the contract requirements.

At the time of the review, there were seven placed children who were taking psychotropic medications. We reviewed their case files to assess the timeliness of psychotropic medication authorizations and to confirm that the medication logs documented correct dosages and that the medications were being administered as prescribed.

SCOPE OF REVIEW

The purpose of this review was to assess Inner Circle FFA's compliance with the contract and State regulations. The visit included a review of the Agency's program statement, administrative internal policies and procedures, 12 placed children's case files, six certified foster parent files and five personnel files. Interviews were conducted with six certified foster parents to assess the quality of care and supervision provided to the children and we conducted interviews with 12 placed children to assess the care and services they were receiving.

A copy of this report has been sent to the Auditor-Controller (A-C) and Community Care Licensing (CCL).

SUMMARY

The Inner Circle FFA was in compliance with several elements of the contract, program statement and regulatory standards reviewed.

Overall, the children interviewed indicated that they were provided with good care and appropriate services, that they were comfortable in their environment and were treated with respect and dignity.

The deficiencies noted during the monitoring review were in the areas of the Needs and Services Plans (NSP). Two initial NSPs were not comprehensive, two foster children, four certified foster parents and one CSW were not offered the opportunity to participate in the NSPs. We noted that one 10-year-old child did not receive a weekly/monthly allowance as per the Agency's Program Statement and there was no allowance log on file for the child. In one of seven psychotropic medication files reviewed, the Psychotropic Medication Authorization (PMA) had expired two months earlier. There was no documentation in the file indicating that the child had seen a psychiatrist during those two months and no documentation indicating that the Agency had made attempts to obtain a PMA. In four of the certified foster parent files reviewed, we found various named substitute caregivers did not have TB/health screens on file, verification of current California Driver's License and car insurance.

The aforementioned deficiencies revealed the need for more thorough documentation. Routine monitoring of the files by a supervisory staff would appear to decrease or eliminate documentation issues found in the files. Overall, the Agency was providing good care and services to placed children and support to the certified foster parents as outlined in its program statement and as evident in the relationships formed with the children, foster parents, staff and the agency.

In conclusion, the Inner Circle FFA was receptive to implementing some systemic changes to improve compliance with regulations and the contract. The Administrator agreed to address the noted deficiencies in a corrective action plan.

NOTABLE FINDINGS

- One child's PMA had expired. There was no documentation in the file that the FFA staff maintained ongoing contact with the psychiatrist and CSW to ensure the timeliness of authorizations and ongoing monitoring by a psychiatrist for medication management.
- One child, age 10, did not have an allowance log in his file. When interviewed, the child and certified foster parents indicated that they were unaware of the FFA's allowance requirements and had not provided the child with a weekly allowance.
- Documentation was missing from the files for several children's NSPs with regard to being comprehensive and including verification that children, certified foster parents and CSWs were offered the opportunity to participate in the NSPs.
- There was no documentation in the file for three children that initial medical and dental examinations were timely.

A detailed report of our findings is attached.

EXIT CONFERENCE

The following are highlights from the Exit Conference held May 23, 2011.

In attendance:

Pamela Jordan, Executive Director and Jill Rosenberg FFA Supervisor and Adoption Coordinator of Inner Circle FFA and Cori Shaffer, CSA I, Monitor, DCFS, OHCMD.

Highlights:

The Executive Director, Pamela Jordan, was in agreement with our findings and recommendations. Ms. Jordan stated that she provided training for her staff on May 24, 2011, with regard to NSP requirements and ensuring all children have initial medical and dental examinations as per the Contract requirements. She will also ensure that her social work staff and certified foster parents are made aware of the Agency's allowance policy and will ensure ongoing compliance and documentation in the files. Additionally, Ms. Jordan indicated that she will review the requirements and will ensure PMAs and routine psychiatric evaluations are maintained and that documentation is maintained in the files.

Inner Circle FFA Executive Director, Pamela Jordan agreed to submit a timely approved written CAP, which addressed each recommendation noted in this compliance report. The CAP is attached.

We will assess for full implementation of the recommendations during our next monitoring review.

If you have any questions, your staff may contact Aldo Marin, Board Relations Manager at (213) 351-5530.

PLB:RS:KR:
EAH:NF:cs

Attachments

c: William T Fujioka, Chief Executive Officer
Wendy Watanabe, Auditor-Controller
Public Information Office
Audit Committee
Pamela Jordan, Executive Director, Inner Circle FFA
Jean Chen, Regional Manager, Community Care Licensing

INNER CIRCLE FOSTER FAMILY AGENCY MONITORING REVIEW-SUMMARY

Main Office:
7120 Hayvenhurst Avenue
Van Nuys, CA 91406
License Number: 191593257

Palmdale Office
1317 E. Palmdale Blvd., Suite 18
Palmdale, CA 93550
License Number: 197602175

	Contract Compliance Monitoring Review	Findings: April 2011
I	<p><u>Licensure/Contract Requirements</u> (6 Elements)</p> <ol style="list-style-type: none"> 1. Timely Notification for Child's Relocation 2. SIRs Documented and Cross-Reporting 3. Runaway Procedures 4. Community Care Licensing Citations, Out-of-Home Care Management Division Reports on Safety and Physical Deficiencies 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA pays Certified Foster Parents Whole Foster Family Home Payments 	<p>Full Compliance (ALL)</p>
II	<p><u>Certified Foster Homes</u> (13 Elements)</p> <ol style="list-style-type: none"> 1. Home Study Prior to Certification 2. Contact with References/Including Check with OHCMD 3. Safety Inspection Prior to Certification 4. Timely DOJ, FBI, CACI 5. Health Screening Prior to Certification 6. Required Training Prior to Certification 7. Current Certificate of Approval on File Including Capacity 8. Home Inspection/Evaluations for Re-certification 9. Completed Training Hours for Re-certification 10. CPR/First-Aid/Water Safety Certificates 11. CDL/Auto Insurance 12. Other Adults: DOJ/FBI/CACI 13. Transportation 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance 11. Full Compliance 12. Needs Improvement 13. Full Compliance

III	<p><u>Facility and Environment</u> (8 Elements)</p> <ol style="list-style-type: none"> 1. Exterior Well Maintained 2. Common Areas Maintained 3. Children's Bedrooms/Interior Maintained 4. Sufficient Recreational Equipment 5. Sufficient Educational Resources 6. Adequate Perishable and Non Perishable Food 7. Disaster Drills Conducted 8. Allowance Logs 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Needs Improvement
IV	<p><u>Maintenance of Required Documentation and Service Delivery</u> (11 Elements)</p> <ol style="list-style-type: none"> 1. DCFS CSW Authorization to Implement NSPs 2. Children's Participation in the Development of NSPs 3. NSPs Implemented and Discussed with Foster Parents 4. Children's Progress Towards Meeting Goals 5. Timely Developed Initial NSPs with Child 6. Timely Comprehensive Initial NSPs with Child 7. Therapeutic Services Received 8. Recommended Assessments/Evaluations Implemented 9. DCFS CSWs Monthly Contacts Documented 10. Timely Developed Updated NSPs with Child 11. Timely Comprehensive Updated NSPs with Child 	<ol style="list-style-type: none"> 1. Needs Improvement 2. Needs Improvement 3. Needs Improvement 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance 11. Needs Improvement
V	<p><u>Education and Workforce Readiness</u> (7 Elements)</p> <ol style="list-style-type: none"> 1. Child Enrolled in School Within Three Days 2. Child Attends School as Required 3. Agency Facilitates Child's Educational Goals 4. Child's Academic and/or Attendance Increase 5. Current IEPs Maintained 6. Current Report Cards Maintained 7. Agency Facilitates Child's Participation in YDS/Equivalent/Vocational Programs 	<p>Full Compliance (ALL)</p>

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VI	<u>Health and Medical Needs</u> (6 Elements) <ol style="list-style-type: none"> 1. Initial Medical Examinations Conducted 2. Initial Medical Examinations Timely 3. Follow-up Medical Examinations Timely 4. Initial Dental Examinations Conducted 5. Initial Dental Examination Timely 6. Follow-up Dental Examinations Timely 	<ol style="list-style-type: none"> 1. Full Compliance 2. Needs Improvement 3. Full Compliance 4. Full Compliance 5. Needs Improvement 6. Full Compliance
VII	<u>Psychotropic Medications</u> (2 Elements) <ol style="list-style-type: none"> 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review 	<ol style="list-style-type: none"> 1. Needs Improvement 2. Needs Improvement
VIII	<u>Personal Rights and Social Emotional Well-Being</u> (13 Elements) <ol style="list-style-type: none"> 1. Children Informed of Home's Policies and Procedures 2. Children Feel Safe 3. Satisfaction with Meals and Snacks 4. Foster Parents Treatment of Children with Respect and Dignity 5. Appropriate Rewards and Discipline System 6. Children Allowed Private Visits, Calls, and Correspondence 7. Children Free to Attend Religious Services/Activities 8. Reasonable Chores 9. Children Informed About Psychotropic Medication 10. Children Aware of Right to Refuse Psychotropic Medication 11. Children Informed About Voluntary Refusal of Medical and Dental Care 12. Children Participation in At-Home, School, Community Activities 13. Children Participation in Extra-Curricular Activities 	<p>Full Compliance (ALL)</p>

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IX	<p><u>Personal Needs/Survival and Economic Well-Being</u> (8 Elements)</p> <ol style="list-style-type: none"> 1. \$50 Clothing Allowance 2. Ongoing Clothing Inventories of Adequate Quantity 3. Ongoing Clothing Inventories of Adequate Quality 4. Involvement in Selection of Clothing 5. Provision of Personal Care Items 6. Minimum Monetary Allowances 7. Management of Allowance 8. Encouragement and Assistance with Life Book 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Needs Improvement 7. Needs Improvement 8. Full Compliance
X	<p><u>Discharge Children</u> (3 Elements)</p> <ol style="list-style-type: none"> 1. Stabilization of Placement Prior to Discharge 2. Discharge Summary Completed 3. Child Completed High School 	<p>Full Compliance (ALL)</p>
XI	<p><u>Personnel Records</u> (14 Elements)</p> <ol style="list-style-type: none"> 1. DOJ Timely Submitted 2. FBI Timely Submitted (After January 1, 2008) 3. CACIs Timely Submitted 4. Signed Criminal Background Statement Timely 5. Education/Experience Requirement 6. Employee Health-Screening Timely 7. Valid Driver's License 8. Signed Copies of FFA Policies and Procedures 9. Initial Training Documentation 10. One-hour Training of Child Abuse Reporting 11. CPR Training Documentation 12. First-Aid Training Documentation 13. Ongoing Training Documentation 14. Social Workers Appropriate Case Ratio 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Needs Improvement 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Full Compliance 11. Full Compliance 12. Full Compliance 13. Full Compliance

**INNER CIRCLE FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW**

Main Office:
7120 Hayvenhurst Avenue
Van Nuys, CA 91406
License Number: 191593257

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Palmdale, CA 93550
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The following report is based on a "point in time" at the time of the monitoring visit. This compliance report addresses findings noted during the April 2011 monitoring review.

CONTRACTUAL COMPLIANCE

During our review of the Inner Circle FFA, we reviewed 12 children's files, six certified foster parent files, five discharge files and five staff files and/or documentation from the provider. The Inner Circle FFA was in full compliance with four of the 11 sections of our Contract Compliance review: Licensure/Contract Requirements; Education and Workforce Readiness; Personal Rights and Social/Emotional Well-Being and Discharge Children. The Inner Circle FFA was in partial compliance with seven of the 11 sections of the review, including Certified Foster Homes; Facility and Environment; Maintenance of Required Documentation and Service Delivery; Health and Medical Needs; Psychotropic Medications; Personal Needs/Survival and Economic Well-Being and Personnel Records. The following report details the results of our review.

CERTIFIED FOSTER HOMES

Based on our review of the six certified foster parent files and/or documentation from the provider, the Inner Circle FFA fully complied with 12 of the 13 elements reviewed. The six certified foster parent files contained all of the required elements, however, two of the certified foster parent files needed documentation for the substitute caregivers. The verification of TB/Health Screening, California Driver's License and current car insurance were missing from the files.

Recommendation:

The Inner Circle FFA management shall ensure that:

1. All noted substitute caregivers have the required TB/Health Screening on file and, if transporting placed children, have current valid California Driver's License and car insurance documentation on file with the FFA.

FACILITY AND ENVIRONMENT

Based on our review of the 12 children's files and/or documentation from the provider, the Inner Circle FFA fully complied with seven of the eight elements.

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With regard to allowance logs, we did not find allowance logs in the file for one ten-year-old foster child. During a visit to the foster home we were informed that the child did not receive monthly allowance per the FFA's Program Statement. The certified foster parents were not aware of the required weekly allowance. OHCMD discussed this with the certified foster parent during the home visit and with the FFA staff who indicated that the matter would be immediately corrected.

Recommendation:

The Inner Circle FFA management shall ensure that:

1. Allowance logs for all age-appropriate children are completed and maintained in the children's files.

MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

Based on our review of the 12 children's files and/or documentation from the provider, the Inner Circle FFA fully complied with seven of 11 elements. With regard to the Needs and Services Plans (NSP), we noted that for one child, there was no CSW authorization to implement the NSP. For two age-appropriate children, there was no indication that they participated in the development of the NSPs. For four of the 12 children's files reviewed, there was no documentation that the certified foster parents participated in the development of the NSPs. For two of the 12 children's files there was no documentation indicating that the treatment team developed a comprehensive initial NSP with the child.

Recommendation:

The Inner Circle FFA shall ensure:

2. The FFA obtains the CSW's authorization, or documents efforts, for implementation of the Needs and Services Plans.
3. All age-appropriate children participate in the development of the Needs and Services Plans and documentation is maintained in the files.
4. Certified Foster Parents participate in the development of the children's Needs and Services Plans and documentation is maintained in the files.
5. Comprehensive initial NSPs are developed.

HEALTH AND MEDICAL NEEDS

Based on our review of the 12 children's files and/or documentation from the provider, the Inner Circle FFA fully complied with four of the six elements reviewed in the area of Health and Medical Needs.

Two children did not have timely initial medical examinations, their initial medical examinations were 20 days late.

Three children did not have timely initial dental examinations. One child's initial dental exam was 23 days late. One child's initial dental exam was 19 days late and one child's initial dental exam was one year late (she was placed at age two, but was not seen by the dentist at age three).

Recommendation:

The Inner Circle FFA management shall ensure that:

6. Children's initial medical examinations are timely and the FFA will routinely monitor and ensure the ongoing compliance of maintaining required documentation in the children's files.
7. Children's initial dental examinations are timely and the FFA will routinely monitor and ensure the ongoing compliance of maintaining required documentation in the children's files.

PSYCHOTROPIC MEDICATION

At the time of the review, there were seven children placed with the Inner Circle FFA who were prescribed psychotropic medication. Based on our review of the seven children's files and/or documentation from the provider, of the two elements in this section, Inner Circle FFA partially complied with the two elements. For one child, the current psychotropic authorization had expired February 4, 2011. There was no current authorization on file and no documentation indicating that the FFA social worker had maintained ongoing contact with the CSW or the psychiatrist regarding the status of the authorization. Additionally, we did not find documentation that the child had seen his psychiatrist for two months during this time of the expired authorization. During the review, the FFA social worker contacted the provider who indicated that the delay was due to foster mother not providing the doctor with updated lab results for the child.

Recommendations:

The Inner Circle FFA management shall ensure that:

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8. Court authorizations for psychotropic medication are current for all children and documentation of the current authorization or attempts to obtain the current authorization are maintained in the files.
9. All children taking psychotropic medication are seen and routinely monitored by a prescribing physician and documentation is maintained in their files. In the event that a child sees a psychiatrist every three months, it needs to be documented in the files.

PERSONAL NEEDS/SURVIVAL AND ECONOMIC WELL-BEING

Based on our review of 12 children's files and/or documentation from the provider and face to face interviews with the placed children and certified foster parents, Inner Circle FFA fully complied with six of the eight elements reviewed in the area of Personal Needs/Survival and Economic Well-Being.

One of the six age-appropriate children did not receive any ongoing monetary allowance from the certified foster parents. The foster parents indicated that they were in agreement to providing a specific amount for allowance each week or month. However, they indicated that they were not aware of the agency's policy on allowance. The certified foster parents and FFA staff indicated that the matter would be immediately corrected.

Recommendation

The Inner Circle FFA management shall ensure that:

10. Placed children receive at least the minimum monetary allowances as per their Program Statement and documentation is maintained in the children's files.
11. Certified foster parents are routinely informed about the FFA's allowance requirements and are routinely monitored for ongoing compliance.

PERSONNEL RECORDS

Based on our review of the five Personnel files and/or documentation from the provider, the Inner Circle FFA fully complied with 13 of the 14 elements in this section. For one staff, hired in October 2001, we did not find written verification of a timely health screening. Per the staff member, she had a health screening prior to her start date, but since it was so long ago, she is unable to locate written verification of the health screening. She indicated that she will complete a new health screening, will provide documentation to OHCMD and will maintain documentation in her personnel file.

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Recommendation

Inner Circle FFA management shall ensure that:

12. All staff have timely health screenings and documentation is maintained in the personnel files.

PRIOR YEAR FOLLOW-UP FROM THE AUDITOR-CONTROLLER'S COMPLIANCE REPORT

The Auditor-Controller's (A-C) last Compliance Review of Inner Circle FFA was posted in May 2008.

Objective

To determine the status of the recommendations reported in the prior monitoring reviews.

Verification

We verified whether the outstanding recommendations from the last Compliance and Performance reports were implemented.

Results

The prior Compliance Report in 2007 noted that 56% of the Needs and Services Plans reviewed did not contain the DCFS CSW's signatures indicating that the CSW's approved the Plans as required; and 22% of the reviewed Plans did not have specific goals as per the Title 22 Regulations. Also noted was that the agency did not disperse Back to School Allowances to their certified foster parents as they were informed by a previous director of the agency that FFA children were not entitled to Back to School allowances. The FFA did not disperse the issued Back to School allowances, but were stored at the Agency. During the Compliance Audit, the Agency was notified that the funds were to be dispersed and the FFA dispersed all of the past warrants that had not expired. It was also noted that the FFA supervising social worker supervised six social workers and also carried a caseload of seven cases, which exceeded the allowable number of cases per the Title 22 Regulations and the DCFS contract.

The A-C's Fiscal Report notes that there were overpayments of \$6,516 in unallowable costs, which DCFS should recover. A former Inner Circle employee embezzled \$700,000 from the Agency, most of the funds being FFA funds from DCFS. The Inner Circle FFA submitted a Corrective Action Plan to the A-C with regard to monies owed.

There were no findings noted during the 2010 DCFS Out-of-Home Care Management Division Performance Review.



January 26, 2012

Cori Shaffer, CSA 1
DCFS Out of Home Care Management Division
9320 Telstar Ave. Suite 216
El Monte, Ca. 91731

Dear Cori Shaffer,

Enclosed with this correspondence is the minutes of the May 24, 2011 Staff Meeting. All Inner Circle staff attended the meeting and were trained on regulations and expectations in regard to NSP requirements. The training included an understanding that our FFA ensures all children have initial medical and dental examinations. In addition, a review of the Inner Circle FFA's Allowance Policy was addressed as well as a discussion regarding the importance of ensuring timely PMAs and routine psychiatric evaluations maintainance with thorough documentation in the files.

1. Inner Circle FFA will ensure that all foster families have been informed of the FFA's policy on Allowance, that all age-appropriate children receive their require amount of allowance at a regular time each week, and that logs are maintained by the foster parents with signatures of the children. Inner Circle social workers will review this and maintain documentation routinely in the child's file.
2. All PMA and Psychiatric Evaluations will be available in the child's file.
3. Inner Circle FFA conducts weekly staff meetings and will continue to remind, review and familiarize all staff about contractual obligations.

Should you require any further information, please contact me at (818) 988-6300, Ext. 203.

Sincerely,

A handwritten signature in cursive script that reads "Pam Jordan".

Pam Jordan, MSW, LCSW, MSLM
Executive Director

Inner Circle Minutes

May 24, 2011

10:15AM

STAFF MEETING

Executive Director Report

Pam

Welcome back Christina!!!!

Cori's audit was pretty good with an approximate score of 95%.

Our training today is on NSP requirements and to make sure all children have initial Medical and Dental exams as per contract requirements. SW's please be sure FP are aware of FFA's allowance policy. We will review files to make sure PMA's and Psychiatric evaluations are documented in the child's files.

Group supervision once a month, last Tuesday of the month

Each SW will present a family case and address goals and progress. Janine and Patty will present first

Salmon/Wanous

Annual evaluations are being written and will be reviewed with each staff.

Duty Day and the effective utilization of time was discussed.

SCHEDULES AND CALENDARS

Please turn in your schedule and your vacation request as soon as possible

To Marta and Pam

Jill

Foster Parent Group on Friday went well, great response

We will have another one in June

We are at # 48 children

Intake calls:

Van Nuys 13 Palmdale 9

Caseload and vacancy lists were passed around to all

Beth

Will be going on medical leave but still continue to work with the picnic

The date will be July 9th from 11-3

Training

Signatures on Quarterlies, Baby sitters must have TB test, drivers license and finger printing clearances

Educate FP on Psychotropic meds, documentation of

Dr. Appointments, dentist appointments, and initial reports, Quarterly reports information must be filled in correctly

As much info as possible is required..

Children over 5 yr old must sign paper work acknowledging the plans for them.